

April 11, 2012

Mr. Lee Weber  
Director of Environmental Services  
ATI - Wah Chang  
1600 Old Salem Road  
PO Box 460  
Albany, Oregon 97321-0460

Pursuant to the authority of ORS 466.195, the Department of Environmental Quality is requesting some general information and specific information pertaining to manifest # 000167371 using profiles 92796-1 and/or 434443 dated 12/16/2011.

General requests:

- 1.) All exemptions and exclusions under 40 CFR 261.4(a)(17);
- 2.) All solid waste determinations for recycled materials under 40 CFR 261.2;
- 3.) A list of all recycling media generated onsite, a description, point of generation, process that produces the recycling product, and where it goes, analytical results including WC mist and immersion testing, and friction testing for ignitable or reactive wastes;
- 4.) A list of offsite producers sending byproducts, co-products, or recycled media to ATI Wah Chang including generation location, description of process, profile #, analytical results;
- 5.) How does recycling media get sent out or sent to WTI Wah Chang (i.e. trip tickets, bills of lading, manifests); and
- 6.) A copy of the Contingency Plan

In regards to the forty drums listed on manifest # 000167371 using profile 434443 and 92796-1, provide answers to each question including all documentation for each question individually.

Documentation should include: where the drums were generated; process generating the media; drum number; carriers; transfer destinations; repackaging information; storage locations; drum description; dates; manifests; bills of lading; receipts; billings; weights; labeling; placarding; trip tickets; HW records; field logs; emails; and any other documents in reference to the forty drums listed on the manifest described above.

**1)** Please provide a list of the drums transported from ATI Wah Chang to WTI Heritage by listing the drum, drum number, description of contents, description and condition of the metal drum, whether it was overpacked, and if the metal drum was immersed in oil inside the overpack. Please provide this information in table form with the documents behind the table specifying which drums the documents pertain to.

**2)** Since ATI Wah Chang considers zirconium fines and grindings as their material and ATI Wah Chang determines where all those materials go for recycling, provide the following information.

- a) Provide all documentation that would include how often and how much recycled material (container numbers, total weights) that was shipped directly from ATI Precision Finishing Rochester PA, to other facilities for recycling/reclamation from January 2010 until present.
- b). Is there a way to correlate the containers to the shipping documents, such as numbers, weights, designating markings, or any other method? Please provide this documentation and explain the correlation.
- c. Were any of the drums listed on manifest #000167371 shipped from Precision Finishing to another facility (either a recycler, or another one of their companies) and then

returned to Rochester prior to shipment to ATI Wah Chang? If so, provide all documentation.

- d. Were any zirconium fines and/or grinding generated at any ATI facility, within the past three years present at any facilities where there was a fire, explosion or release? Discuss where it was generated and when and where the fire, explosion or release occurred.
- e. Were the 40 drums on manifest #000167371 the same containers received at Wah Chang from Rochester PA? Where were the forty drums on manifest #000167371 generated from and where were they stored prior to coming to ATI Wah Chang? Where did the forty drums listed on manifest #000167371 go between receiving the drums at Wah Chang and when they were determined to be waste? Were the forty drums on manifest #000167371 stored at ATI Wah Chang? How long? When were they overpacked and why?

**3) The drums were shipped from Precision Finishing to ATI Wah Chang.**

- a. Were the drums on the July shipping document actually generated and placed into overpack drums at ATI Precision Finishing or at ATI Wah Chang? Where were they generated? Are these the same 40 drums on manifest #000167371 or had those initial drums been consolidated with others?. If the drums were consolidated, explain by drum number what was included in each drum.
- b. When these containers were received from Precision Finishing at ATI Wah Chang, what was the condition of the containers? Please provide photos, analytical, documentation, sample results, etc. for each drum.
- c. How and where were the containers stored at ATI Wah Chang ? Provide inspections and photos or other documentation about the storage and condition of the drums.
- d. When was Veolia first contacted by any ATI company about the containers on the July shipping document? Provide documentation.
- e. The Department understands that the 40 drums listed on manifest #167371 were not in good condition and required overpacking. How did the drums become unsafe for transport? .

**4) ATI Wah Chang received the 40 drums listed on manifest #000167371 in order to evaluate the material and determine whether the material could be reused or recycled.**

- a. What processes or sampling was conducted or attempted? Provide documentation.
- b. Provide analytical results including QA/QC, all profiles, and inspection documentation specific to the 40 drums listed in manifest #000167371.

**5) Since WTI Wah Chang is sent all material to be recycled by other ATI facilities, provide all shipments (shipping documents, trip tickets, manifests, etc.) Veolia arranged to leave ATI Precision Finishing Rochester PA from January 2010 until present.**

Those records should include:

- a. All versions of all profiles set up from both Precision Finishing Rochester PA and ATI Wah Chang, through Veolia (formerly Onyx).
- b. All email between ATI Wah Chang and Veolia regarding the 40 drums on manifest #000167371 including condition, size, and material. All email between ATI Wah Chang and Precision Finishing Rochester PA regarding these containers.
- c. All email between Precision Finishing Rochester PA and Veolia regarding the 40 drums listed on manifest #000167371.

6) In reference to manifest #0001667371 using profiles 434443 and 92796-1

- a) Do you have any information about why the 40 drums on manifest #000167371 were sent on the manifest #000167371 when the profiles indicated the contents were non-hazardous?
- b) Why were the drums in 55-gallon containers when WTI required only 30 gallon drums or 400 pound containers?

7) It is our understanding there were two shipments being discussed prior to sending the 40 drums on Manifest #000167371. They included 40 30 gallon containers and 40 55-gallon containers of metal fines that were being discussed in an e-mail between Eric Feist, WTI-Heritage, and Frank Hamilton.

- a) Were these loads consolidated, sent together, or sent at different times to WTI Heritage? Please provide documentation for both loads if not the 40 drums listed on manifest 000167371. If they were the drums listed on manifest #000167371, provide the descriptions, drum numbers and which load they came from.

8) In your response discuss when, where, and how ATI Wah Chang intends to send the drums that are being stored at WTI Heritage and listed on manifest #000167371.

**The Department requests a written response by April 30, 2012.** Should you have any questions about the content of this letter, feel free contact me in writing or by phone at 503-378-5310.

Please send your response to:

Susan Shewczyk  
Department of Environmental Quality  
750 Front Street NE., Suite 120  
Salem, OR 97301-1039

Sincerely,

Susan Shewczyk  
Hazardous Waste Inspector  
Western Region